

Exhibit AN

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1 SUPERIOR COURT OF NEW JERSEY
2 LAW DIVISION - MIDDLESEX COUNTY
3 DOCKET NO. MID-L-003809-18AS
4

5 KAYME A. CLARK and VIRTUAL
6 DUSTIN W. CLARK, DEPOSITION UPON
7 Plaintiffs, ORAL EXAMINATION
8 v. OF WILLIAM E. LONGO
9 Defendants. Ph.D.

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TRANSCRIPT of the stenographic notes
of ANDREA F. NOCKS, a Certified Court Reporter and
Certified Realtime Court Reporter of the State of
New Jersey, Certificate No. XI01573, taken virtually
on April 2, 2024, commencing at 11:18 a.m., Eastern
Standard Time.

Job No. 6625014

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1	APPEARANCES:	1 EXHIBITS
2	DEAN OMAR BRANHAM SHIRLEY LLP	2 NUMBER DESCRIPTION IDENTIFICATION
	BY: BENJAMIN D. BRALY, ESQ.	3 1D March 29, 2024 letter 160
3	302 North Market Street	4 1E April 1, 2024 e-mail 160
	Suite 300	5 2C Updated testimony list 160
4	Dallas, Texas 75202	6 2D Case-specific invoices
	Attorneys for Plaintiffs	7 (To be produced)
5		8 10H 15-page set of M65947
6		9 PLM-count sheets 160
7		10 11A January 25, 2021
8	KING & SPALDING LLP	11 M71211 report 171
	BY: KEVIN HYNES, ESQ.	12 11B March 23, 2021 report 198
9	1185 Avenue of the Americas	13 12A Project M71614, the Valadez
	34th Floor	14 container, February 28, 2023 198
10	New York, New York 10036	15 12B October 19th, 2023
	-AND-	16 M71643 report 198
11	McCARTER & ENGLISH, LLP	17 12C Project M71730,
	BY: JOHN GARDE, ESQ.	18 November 28, 2023,
12	Four Gateway Center	19 Henderson report 198
	100 Mulberry Street	20 12D Project M71740,
13	Newark, New Jersey 07102	21 February 15, 2024
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3	WITNESS:	3 13B April 6, 2020 M71046
4	WILLIAM E. LONGO, Ph.D.	4 Colley report 198
5		5 13C Project M71262,
6	EXAMINATION BY:	6 March 11, 2022
7	MR. HYNES	7 Klayman report 199
8	MR. BRALY	8
9		9 8B Chart
10		10 (marked 3/22/2024) 241
11		11 (Exhibits e-mailed to p1steno@veritext.com)
12		12
13		13
14		14 REQUEST FOR PRODUCTION
15		15
16		16 PAGE NO. 172...Worksheets that were generated in
17		17 connection with project M71211
18		18 PAGE NO. 195...Antigorite images by PLM 1.550
19		19 refractive index oil, parallel and perpendicular
20		20 orientation
21		21 PAGE NO. 196...Lizardite images in 1.550 refractive
22		22 index oil, parallel and perpendicular orientation
23		23 PAGE NO. 237...Chrysotile in talc PLM-count sheets
24		24 for reports that were marked as exhibits
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<p style="text-align: right;">Page 240</p> <p>1 understand what you're telling us.</p> <p>2 CROSS-EXAMINATION BY MR. BRALY:</p> <p>3 Q. Bill, I just wanted to cover just a</p> <p>4 couple of things with you for a minute if we can.</p> <p>5 As a part of what was disclosed in</p> <p>6 this case that included your affidavit from the</p> <p>7 Tippin case, your affidavit from the declaration</p> <p>8 that you signed from September 25 of 2023, and</p> <p>9 several other charts, declarations and statements</p> <p>10 that I'm not going to ask you about in any kind of</p> <p>11 detail, but I do want to make it clear that you've</p> <p>12 tested many different products originating from</p> <p>13 mine-sourced locations that are consistent with the</p> <p>14 years of the mine sources associated with Johnson &</p> <p>15 Johnson's products for particular years.</p> <p>16 Is that fair?</p> <p>17 MR. HYNES: Object to form; leading.</p> <p>18 BY MR. BRALY:</p> <p>19 Q. I'm sorry, Bill. Will you just</p> <p>20 repeat your answer?</p> <p>21 A. That is correct. That's true.</p> <p>22 Q. Okay. And I just want to make it</p> <p>23 clear on the record that that was also part of what</p> <p>24 was disclosed, as part of the foundation and</p> <p>25 reliance on what you may be asked about at trial,</p>	<p style="text-align: right;">Page 242</p> <p>1 February 24 of 2023.</p> <p>2 A. You mean this one?</p> <p>3 Q. No, not that one. I'll just put it</p> <p>4 on the screen.</p> <p>5 A. Okay.</p> <p>6 Q. Whatever the next exhibit is. This</p> <p>7 was a chart that was used in the plant in South</p> <p>8 Carolina.</p> <p>9 A. Okay.</p> <p>10 Q. This was part of the material that</p> <p>11 was produced for your reliance materials and --</p> <p>12 A. I know those charts, I mean,</p> <p>13 obviously.</p> <p>14 Q. So, for example, the section that</p> <p>15 says "talc from China" here at the bottom, and it</p> <p>16 lists out various sources of testing, including</p> <p>17 testing, for example, in this first entry of</p> <p>18 Chanel's products.</p> <p>19 A. Correct.</p> <p>20 Q. That's all I'm getting across to you.</p> <p>21 A. Okay.</p> <p>22 Q. Is that some of the knowledge that</p> <p>23 you have about your certainty of the presence of</p> <p>24 asbestos in certain Johnson & Johnson products does</p> <p>25 come from testing of other manufacturers' products</p>
<p style="text-align: right;">Page 241</p> <p>1 relevant to how you know that certain vintages and</p> <p>2 years of Johnson & Johnson products contain</p> <p>3 asbestos, in addition to your direct observation of</p> <p>4 Johnson & Johnson specific products; fair?</p> <p>5 MR. HYNES: Objection.</p> <p>6 A. Well, it's fair. I mean, they're</p> <p>7 documentation.</p> <p>8 For example, the Hammondsburg mine</p> <p>9 and the Argonaut mine, they developed a pilot plant</p> <p>10 to figure out if they could remove the asbestos</p> <p>11 using different surfactants, and, you know, they</p> <p>12 spiked the sample and then they compared it to the</p> <p>13 others. And the surfactants somewhat worked for the</p> <p>14 tremolite, anthophyllite, chrysotile, but couldn't</p> <p>15 remove it all; it would reduce the concentration.</p> <p>16 Now, if there's actually no asbestos</p> <p>17 in any of these mines, why would J&J be spending all</p> <p>18 that money to try to remove something that didn't</p> <p>19 exist?</p> <p>20 MR. HYNES: Move to strike the</p> <p>21 nonresponsive portion.</p> <p>22 BY MR. BRALY:</p> <p>23 Q. For example, and I could show this if</p> <p>24 you don't recall it, but there was a chart that was</p> <p>25 produced that's referred to as the -- it's from</p>	<p style="text-align: right;">Page 243</p> <p>1 using the same source material; fair?</p> <p>2 A. Fair.</p> <p>3 MR. HYNES: Object to form.</p> <p>4 BY MR. BRALY:</p> <p>5 Q. Okay. That's all I wanted to</p> <p>6 establish. I'll hold on to the rest of the</p> <p>7 questions till I have you at trial. Thank you,</p> <p>8 Dr. Longo.</p> <p>9 A. Thank you.</p> <p>10 THE WITNESS: And, Kevin, I</p> <p>11 appreciate your professionalism, meaning you don't</p> <p>12 take this personally, I don't either, and you're</p> <p>13 not, you know, trying to mimic, or hopefully nobody</p> <p>14 does, somebody like Robert Thackston, who can be</p> <p>15 very personal and aggressive. So I appreciate your</p> <p>16 professionalism.</p> <p>17 MR. HYNES: I think we're ready to go</p> <p>18 off the record. And thanks again for your time</p> <p>19 today, Dr. Longo.</p> <p>20 THE WITNESS: Thanks, guys.</p> <p>21 (Deposition adjourns: 2:09 p.m.,</p> <p>22 Eastern Standard Time.)</p> <p>23</p> <p>24</p> <p>25</p>

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1 CERTIFICATE OF OFFICER

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3 I CERTIFY that the foregoing is a true
4 and accurate transcript of the testimony and
5 proceedings as reported stenographically by me at
6 the time, place and on the date as hereinbefore set
7 forth.

8 I DO FURTHER CERTIFY that I am neither
9 a relative nor employee nor attorney or counsel of
10 any of the parties to this action, and that I am
11 neither a relative nor employee of such attorney or
12 counsel, and that I am not financially interested in
13 the action.

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16 ANDREA NOCKS, CCR, CRR
17 Certificate No. X100157300
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